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October 14, 2015

The Honorable Magistrate Judge Locke  
United States District Court  
Long Island Courthouse  
100 Federal Plaza  
Central Islip, NY 11722

**Re: Stay Pending Motion to Quash and Extension of Related 4(m) Deadlines**

Dear Honorable Magistrate Locke:

The James Law Firm, PLLC represents Malibu Media, LLC in the copyright infringement cases identified below. The cases are pending before you in the Eastern District of New York. In each case, Plaintiff served a subpoena and a copy of your earlier related order permitting a third party subpoena on either Verizon Internet Services or Optimum Online High Speed Internet Service, ("ISP") depending on the case, requesting that they respond to the subpoena and order. In response to a Motion to Quash filed in the action Malibu Media, LLC v. Doe, bearing case number 15-cv-3504(JFB)(SIL), your Honor stayed the ISP's responses to those subpoena in the following cases:

15-cv-1859(LDW)(SIL))	15-cv-3301 (ADS)(SIL)	15-cv-3484 (DRH)(SIL)
15-cv-1867 (JMA)(SIL)	15-cv-3505 (JFB)(SIL)	15-cv-3486 (ADS)(SIL)
15-cv-1868 (JMA)(SIL)	15-cv-3478 (JS)(SIL)	15-cv-3488 (SJF)(SIL)
15-cv-1861 LDW)(SIL)	15-cv-3499 (JFB)(SIL)	15-cv-3490 (ADS)(SIL)
15-cv-2720 (JMA)(SIL)	15-cv-3481 (ADS)(SIL)	15-cv-3485 (DRH)(SIL)
15-cv-2732 (JFB)(SIL)	15-cv-3489 (ADS)(SIL)	15-cv-3483 (ADS)(SIL)
15-cv-3299 (SJF)(SIL)	15-cv-3491 (JFB)(SIL)	15-cv-3497 (LDW)(SIL)
15-cv-3300 (JFB)(SIL)	15-cv-3492 (DRH)(SIL)	15-cv-3496 (ADS)(SIL)
15-cv-3306 (SJF)(SIL)	15-cv-3495 (SJF)(SIL)	15-cv-3482 (ADS)(SIL)
15-cv-3303 LDW)(SIL)	15-cv-3498 (SJF)(SIL)	15-cv-3500 (LDW)(SIL)
15-cv-3305 (JMA)(SIL)	15-cv-3502 (JS)(SIL)	15-cv-3504 (JFB)(SIL)
15-cv-3480 (JMA)(SIL)	15-cv-3503 (JMA)(SIL)	15-cv-4787 (JMA)(SIL)
15-cv-3463 LDW)(SIL)	15-cv-4797 (SJF)(SIL)	15-cv-4789 (JMA)(SIL)
15-cv-1855 (SJF)(SIL)	15-cv-4798 (ADS)(SIL)	15-cv-4795 (LDW)(SIL)
15-cv-1856 (ADS)(SIL)	15-cv-4799 (ADS)(SIL)	15-cv-4788 (JS)(SIL)
15-cv-1863 (JS)(SIL)	15-cv-4800 (JS)(SIL)	15-cv-4796 (JMA)(SIL)
15-cv-1866 (JMA)(SIL)	15-cv-4801 (JMA)(SIL)	15-cv-4807 (DRH)(SIL)
15-cv-1865 (DRH)(SIL)	15-cv-4802 (SJF)(SIL)	15-cv-4808 (JS)(SIL)
15-cv-1864 (JFB)(SIL)	15-cv-4803 (LDW)(SIL)	15-cv-4809 (ADS)(SIL)
15-cv-2719 (SJF)(SIL)	15-cv-4804 (ADS)(SIL)	15-cv-4810 (LDW)(SIL)
15-cv-2721 (JS)(SIL)	15-cv-4805 (LDW)(SIL)	15-cv-4812 (JS)(SIL)
15-cv-2702 (LDW)(SIL)	15-cv-4806 (SJF)(SIL)	
15-cv-2729 (ADS)(SIL)	15-cv-3216 (ADS)(SIL)	
	15-cv-3494 (JMA)(SIL)	

Plaintiff's counsel has or is in the process of serving the ISP copies of this Court's Order instructing the ISP to refrain from complying with the subpoena until further instruction of this Court. *See* Letters to the ISP attaching the Court's order to stay in the abovementioned cases attached hereto. Verizon is served by fax and has confirm receipt of the orders to stay. Optimum Online High Speed Internet Service is served in person and Plaintiff has sent out all those matters to its process server for in hand delivery and is awaiting affidavits of service.

Per this Court's Orders staying the responses to the third party subpoenas, pending resolution of Doe Defendant's Motion to Quash in action Malibu Media v. Doe, bearing case 15-cv-03504-(JSD)-(SIL), Plaintiff will not be receiving responses from the ISP's. Consequently, Plaintiff will not be amending its Complaints to name the individuals at this time. Since Plaintiff will not be in possession of the subscribers' identifying information, it will be unable to amend its complaints or to effectuate service on any of the Defendants in the above matters. The October 6, 2015 Order to Stay does not explicitly reset the Fed. R. Civ. P. Rule 4(m) deadlines. In approximately 28 of the above-mentioned cases, the 4(m) deadline is set for today and the 4(m) deadline will be due in the remaining cases within the upcoming weeks.

Therefore, Plaintiff respectfully requests that the Court reset the 4(m) deadlines, if applicable, after the resolution of the pending motion to quash. In the alternative if this Court instructs Plaintiff to file 68 separate letter motions to extend the 4(m) deadline, Plaintiff requests sufficient time to comply with any such order.

Should you have any questions or concerns regarding this letter, please do not hesitate to contact the undersigned.

Respectfully Submitted,

**The James Law Firm, PLLC**

By: Jacqueline M. James, Esq.

*Attorneys for Plaintiff*

Jacqueline M. James, Esq. (1845)

The James Law Firm, PLLC

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October 06, 2015

To: Optimum Online High Speed Internet Service  
c/o CSC HOLDINGS, INC. (Cablevision Systems)  
1111 Stewart Avenue  
Bethpage, NY 11714  
Via Facsimile: (516) 803-2990

**Re: Stay Pending Motion to Quash**

Dear Sir or Madam:

The James Law Firm, PLLC represents Malibu Media, LLC in the peer-to-peer copyright infringement cases identified below. The cases are pending in the Eastern District of New York. In each case, I served a subpoena on Optimum Online High Speed Internet Services requesting that it identify the applicable subscriber. In response to a Motion to Quash filed in 15-cv-3504(JFB)(SIL), the Judge stayed the following cases:

15-cv-1855 (SJF)(SIL)	15-cv-3505 (JFB)(SIL)
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15-cv-3485 (DRH)(SIL)	15-cv-4803 (LDW)(SIL)
15-cv-3483 (ADS)(SIL)	15-cv-4804 (ADS)(SIL)
15-cv-3497 (LDW)(SIL)	15-cv-4805 (LDW)(SIL)
15-cv-3496 (ADS)(SIL)	15-cv-4806 (SJF)(SIL)

A copy of the order is attached hereto. Please refrain from complying with the subpoena until further notice. If you have any questions, please do not hesitate to contact me.

Sincerely yours,

**The James Law Firm, PLLC**

By: Jacqueline M. James, Esq.

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October 06, 2015

Verizon Internet Services  
Verizon Legal Compliance  
Custodian of Record  
2701 S. Johnson Street  
Mc-TXD01613  
San Angelo, TX 76904  
Via Facsimile: (325) 949-6916

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15-cv-3480 (JMA)(SIL)	15-cv-4810 (LDW)(SIL)
15-cv-3463 (LDW)(SIL)	15-cv-4812 (JS)(SIL)

A copy of the order is attached hereto. Please refrain from complying with the subpoena until further notice. If you have any questions, please do not hesitate to contact me.

Sincerely yours,

**The James Law Firm, PLLC**

By: *Jacqueline M. James, Esq.*